

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2018-202-E

IN RE:

Petition of Duke Energy Carolinas, LLC)	
and Duke Energy Progress, LLC for)	
Approval of CPRE Queue Number)	PETITION TO INTERVENE
Proposal, Limited Waiver of Generator)	
Interconnection Procedures, and Request)	
for Expedited Review)	

Petitioner Duke Energy Renewables, Inc. (“Petitioner” or “Duke Renewables”) hereby petitions the South Carolina Public Service Commission (the “Commission”), pursuant to Rule 103-825 of the Commission’s Rules, for an order allowing Petitioner to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its petition, Petitioner would show the Commission the following:

1. Duke Renewables is a Delaware corporation, with its principal place of business at 550 South Caldwell Street, NASCAR Plaza, Charlotte, North Carolina 28202-4200.
2. Duke Renewables is an indirect, wholly-owned subsidiary of Duke Energy Corporation (“Duke Energy”).
3. Duke Renewables is part of Duke Energy’s Commercial Renewables business segment, which acquires, builds, develops, owns and operates renewable energy facilities throughout the continental United States, including operating utility-scale wind and solar facilities totaling approximately 3,000 megawatts located in thirteen states.

4. Duke Renewables is an affiliate of Duke Energy Carolinas, LLC (“DEC”), and Duke Energy Progress, LLC (“DEP”) (together the “Companies”), and operates independently from the Companies for purposes of the Competitive Procurement of Renewable Energy (“CPRE”) program described herein and in the Petition of the Companies for Approval of CPRE Queue Number Proposal, Limited Waivers of Generator Interconnection Procedures, and Request for Expedited Review (the “Petition”).

5. Duke Renewables intends to participate in the CPRE Program as a potential operator of “renewable energy facilities” in South Carolina. Duke Renewables owns renewable energy projects in various stages of development in North and South Carolina that could be affected by its participation in the CPRE Program. A number of these projects have Interconnection Requests pending and have received a Queue Number pursuant to the “South Carolina Interconnection Procedures, Forms, and Agreements for State-Jurisdictional Generator Interconnections” effective date April 26, 2016. As such, Duke Renewables is a developer of utility-scale solar generating facilities in South Carolina (a “SC Solar Generator”) as described in the Petition.

6. As a national developer, acquirer, owner and operator of utility-scale wind and solar generation facilities, and other renewable energy facilities, and as a developer affiliated with the Companies intending to participate in the CPRE Program, Duke Renewables has a direct and substantial interest in the matters to be addressed by the Commission in this Docket, and no other party to this Docket can adequately represent Duke Renewables’ interests in these proceedings.

7. Petitioner should therefore be permitted to intervene in this proceeding to participate fully and present testimony and other evidence in this Docket as appropriate.

8. Petitioner supports the relief requested by the Companies. However, Petitioner reserves the right to set forth its position more fully as necessary and appropriate as this proceeding moves forward.

9. Petitioner's authorized representative in this proceeding is the undersigned.

WHEREFORE, Petitioner prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2018-202-E, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ADAMS AND REESE LLP

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September 28, 2018
Columbia, South Carolina

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, the **Petition to Intervene** to the individuals listed below via electronic mail to the e-mail address on file with the Public Service Commission:

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s/ John J. Pringle, Jr.
 John J. Pringle, Jr.

September 28, 2018
 Columbia, South Carolina